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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CENTURY-NATIONAL INSURANCE
COMPANY, a California corporation, PACIFIC
PIONEER INSURANCE GROUP, INC., a
Delaware corporation, PACIFIC PIONEER
INSURANCE COMPANY, a California
corporation, and UCA GENERAL
INSURANCE SERVICES, a California
corporation,

Plaintiffs,

v.

DOUGLAS J. GARDNER, ESQ., an individual,
DOUGLAS J. GARDNER, LTD., a Nevada
domestic professional corporation, Rands &
SOUTH, LTD., a Nevada domestic
professional corporation, ALPS PROPERTY &
CASUALTY INSURANCE COMPANY, a
Montana corporation, DOES 1 through 20,
inclusive.

Defendants.

CASE NO.: 2:18-cv-02090-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
STIPULATION AND ORDER FOR
DISMISSAL OF THE GARDNER
DEFENDANTS' CLAIMS**

(THIRD REQUEST)

Plaintiffs, CENTURY-NATIONAL INSURANCE COMPANY, PACIFIC PIONEER
INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and UCA
GENERAL INSURANCE SERVICES ("Plaintiffs") and Defendants, DOUGLAS J.
GARDNER, ESQ., DOUGLAS J. GARDNER, LTD, and Rands & South, LTD.

1 (“Gardner Defendants”), by and through their respective counsel, hereby agree and
2 stipulate as follows:

3 Whereas, at the Settlement Conference held on August 24, 2022 before
4 Magistrate Judge Cam Ferenbach, the parties agreed that the claims between Plaintiffs
5 and the Gardner Defendants have settled, while the remaining claims will proceed on
6 the normal litigation track.

7 Whereas, the Court initially ordered that the proposed stipulation and order for
8 dismissal of the Gardner claims must be filed on or before September 28, 2022 (Doc.
9 No. 158).

10 Whereas, on September 29, 2022 and pursuant to the Stipulation between
11 Plaintiffs and the Gardner Defendants (First Request), the Court issued an Order to
12 Extend Time to File Proposed Stipulation and Order for Dismissal of the Gardner
13 Defendants’ Claims up to October 12, 2022 (ECF No. 165).

14 Whereas, on October 25, 2022 and pursuant to the Stipulation between Plaintiffs
15 and the Gardner Defendants (Second Request), the Court issued an Order to Extend
16 Time to File Stipulation and Order for Dismissal of the Gardner Defendants’ Claims up
17 to today, October 26, 2022 (ECF No. 169).

18 Whereas, the Parties have been in continuing communication and are now in the
19 final stretch of arrangements as the settlement proceeds are in transit. After the
20 proceeds arrive and are exchanged, the Parties will submit the dismissal document to
21 the Honorable Court for approval. Therefore, Plaintiffs and the Gardner Defendants
22 have again agreed to request the Court for extension of time of additional two (2) weeks
23 from the current deadline, to file their proposed stipulation and order for dismissal of the
24 Gardner claims.

25 WHEREFORE, it is hereby AGREED AND STIPULATED TO by and between
26 Plaintiffs and the Gardner Defendants that the submission of the stipulation and order
27 for dismissal of the Gardner claims shall be extended for a period of two (2) weeks from
28 its current due date of October 26, 2022, to **Wednesday, November 9, 2022.**

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This is the parties' third request for extension and is their way of accommodating each other. The parties certify that this Stipulation is made in good faith and is not sought for the purpose of undue delay or to cause prejudice to any party.

IT IS SO STIPULATED.

DATED this 26th day of October, 2022.

PYATT SILVESTRI

LIPSON NEILSON P.C.

/s/ James P.C. Silvestri

/s/ Joseph P. Garin

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*Attorneys for Plaintiffs Century-National
Insurance Company, Pacific Pioneer
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Insurance Company, and
UCA General Insurance Services*

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: November 3, 2022

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